

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO**

April Thompson

Plaintiff,

v.

Nationwide Debt Management Solutions,
LLC, et al.

Defendants.

CASE NO: 4:16-cv-2745

JUDGE:

JOINT NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendants Nationwide Debt Management Solutions, LLC & Eric Medrano, by counsel, hereby remove the above-captioned action from the Mahoning County Court of Common Pleas to the United States District Court, Northern District of Ohio on the following grounds:

1. Plaintiff April Thompson (“Thompson”) filed this action in the Mahoning County Court of Common Pleas, Case No. 16-cv-2648, on October 3, 2016.
2. Thompson’s Complaint (attached hereto as Exhibit A) alleges a claim under the federal Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et. seq.*
3. On October 11, 2016, a copy of the Summons and Complaint was served on Defendants (summons attached hereto as Exhibit B). Therefore, this removal is timely pursuant to 28 U.S.C. § 1446(b), having been made and filed within thirty days of receipt by Defendants of a copy of the initial pleading setting forth the claim for relief

upon which jurisdiction is based.

4. The United States District Court for the Northern District of Ohio has federal question jurisdiction over this case pursuant to 28 U.S.C. § 1331 because the Complaint is based on alleged violations of the federal Fair Debt Collection Practices Act, 15 U.S.C. 1692.

5. Defendants do not consent to personal jurisdiction. Defendants do not waive the defense of lack of personal jurisdiction. Defendants reserve the right to raise lack of personal jurisdiction in a motion or pleading.

PLEASE TAKE NOTICE that a copy of this Notice will be transmitted to the Clerk of the Mahoning County Court of Common Pleas pursuant to 28 U.S.C. § 1446(d).

Respectfully submitted,

/s/ Boyd W. Gentry

Boyd W. Gentry (0071057)

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*Trial Attorney for Nationwide Debt Management
Solutions, LLC & Eric Medrano*

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing has been served by electronic mail on November 10, 2016, to the following:

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/s/ Boyd W. Gentry
Boyd W. Gentry (0071057)